



## DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711  
<http://www.dfeh.ca.gov> | Email: [contact.center@dfeh.ca.gov](mailto:contact.center@dfeh.ca.gov)

June 3, 2019

Darren Campbell  
2030 Main Street  
Irvine, California 92614

RE: **Notice to Complainant's Attorney**  
DFEH Matter Number: [REDACTED]  
Right to Sue: [REDACTED] Cathedral City et al.

Dear Darren Campbell:

Attached is a copy of your complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

**Pursuant to Government Code section 12962, DFEH will not serve these documents on the employer.** You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing



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June 3, 2019

RE: **Notice of Filing of Discrimination Complaint**

DFEH Matter Number: [REDACTED]

Right to Sue: [REDACTED] Cathedral City et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. This case is not being investigated by DFEH and is being closed immediately. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing



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June 3, 2019



RE: **Notice of Case Closure and Right to Sue**  
DFEH Matter Number: [REDACTED]  
Right to Sue: [REDACTED] Cathedral City et al.

Dear [REDACTED]

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective June 3, 2019 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Department of Fair Employment and Housing

**COMPLAINT OF EMPLOYMENT DISCRIMINATION  
BEFORE THE STATE OF CALIFORNIA  
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING  
Under the California Fair Employment and Housing Act  
(Gov. Code, § 12900 et seq.)**

**In the Matter of the Complaint of**

DFEH No. [REDACTED]

[REDACTED]  
Complainant,

vs.

Cathedral City  
68700 Avenida Lalo Guerrero  
Cathedral City, California 92234

Travis Walker  
68700 Avenida Lalo Guerrero  
Cathedral City, California 92234

Respondents

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1. Respondent **Cathedral City** is an **employer** subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant [REDACTED] resides in the City of [REDACTED] State of **California**.

3. Complainant alleges that on or about **May 15, 2019**, respondent took the following adverse actions:

**Complainant was harassed** because of complainant's sex/gender, sexual harassment- hostile environment, sexual harassment- quid pro quo.

**Complainant was discriminated against** because of complainant's sex/gender, sexual harassment- hostile environment, sexual harassment- quid pro quo and as a result of the discrimination was denied hire or promotion, asked impermissible non-job-related questions, denied a work environment free of discrimination and/or retaliation, denied any employment benefit or privilege.

**Complainant experienced retaliation** because complainant reported or resisted any form of discrimination or harassment and as a result was denied hire or

1 promotion, denied a work environment free of discrimination and/or retaliation,  
2 denied any employment benefit or privilege.

3 **Additional Complaint Details:** From August 2010 until June 2017, [REDACTED]  
4 worked as a [REDACTED] for the Cathedral City Police Department. In January 2018,  
5 after having spent seven months in Nevada with her family, Chief of Police Travis  
6 Walker recruited [REDACTED] back to the Cathedral City Police Department. Chief  
7 Walker explained to [REDACTED] that he had ideas for positions at the police  
8 department that he wanted to open up and thought she would fit into some of those  
9 positions as he stated he would be creating new opportunities. He even encouraged  
10 [REDACTED] to obtain a degree in Public Administration if she wanted to be  
11 considered for a future supervisor or manager position.

12 [REDACTED] returned to the Cathedral City Police Department [REDACTED] in  
13 February 2018. At the time of her return, [REDACTED] was working night shifts. In  
14 trying to be a thoughtful co-worker, she brought in stress relief items for the dispatch  
15 group on her shift. She also brought a gift bag for Chief Walker and a thank you  
16 card. The gift bag that she gave to Chief Walker contained a "S-hook," which is  
17 intended to be used by a person to stretch their own back. Instead of using it to  
18 stretch his own back, Chief Walker placed the S-hook between [REDACTED] legs  
19 and rubbed her with it. [REDACTED] was shocked by Chief Walker's actions and  
20 walked away to begin her shift.

21 As the year progressed, on at least 6 to 8 separate occasions, Chief Walker would  
22 try to fondle [REDACTED] over and under her shirt. On another occasion, Chief  
23 Walker pulled his penis out and placed it in [REDACTED] hand. Chief Walker would  
24 make up reasons that he needed to see [REDACTED] in his office alone and [REDACTED]  
25 [REDACTED] had no choice but to comply with Chief Walker's demands. Chief Walker  
26 would grab [REDACTED] hands and force her to touch him. Chief Walker would  
27 also text [REDACTED] on her personal phone from either his personal or work  
28 phone. Due to the harassment that she was suffering, [REDACTED] applied for a  
position at another police department.

[REDACTED] wanted to speak to Chief Walker to let him know she was going to  
start background checks at other police departments and was considering leaving  
the Cathedral City Police Department and wanted to do it in a public place. On  
October 3, 2018, Chief Walker texted [REDACTED] that he was at a Law  
Enforcement conference at the Hotel Miramonte in Indian Wells, CA. In the text  
message, she saw that Chief Walker was outside the hotel in front of some fire pits  
and there were other law enforcement personnel there.  
However, when she arrived, she texted him to confirm where to park and he replied  
with his room number then called her cell phone to guide her around the complex.

1 When she got to his room, Chief Walker was wearing only boxer shorts and a shirt.  
2 When [REDACTED] entered the room, Chief Walker immediately led her right to the  
3 bed, he tried to pull off her clothes, he was being very aggressive and rough. Since  
4 her shoes were still on, it prevented Chief Walker from taking off her pants, but Chief  
5 Walker was able to pull down [REDACTED] underwear and he put himself inside  
6 her. [REDACTED] pushed him off, and she left the hotel. After the encounter at  
7 Chief Walker's hotel room, [REDACTED] was numb. She did not know what to do.  
8 [REDACTED] did not get the job at the other police department and ultimately  
9 withdrew in fear of the situation. Because she needed her job, she continued to work  
10 for the Cathedral City Police Department. And, Chief Walker continued to sexually  
11 harass [REDACTED] by grabbing and fondling her.

12 On April 30, 2019 [REDACTED] reported the October 3, 2018 incident to the  
13 Riverside Sheriff Department. The next day, she reported Chief Walker's behavior to  
14 the Human Resources department of the Cathedral City Police Department. [REDACTED]  
15 [REDACTED] has suffered severe emotional distress due to the sexual harassment she  
16 was forced to endure from Cathedral City Police Department's Chief of Police. She  
17 is currently off work due to stress and has been on anti-depressants and anxiety  
18 medication.  
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1 VERIFICATION

2 I, **Darren J. Campbell**, am the **Attorney** in the above-entitled complaint. I have read  
3 the foregoing complaint and know the contents thereof. The matters alleged are  
4 based on information and belief, which I believe to be true.

5 On June 3, 2019, I declare under penalty of perjury under the laws of the State of  
6 California that the foregoing is true and correct.

7 **Anaheim, California**  
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